

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DOCKET NO: 05-CR-10220

\_\_\_\_\_  
UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
JAMES GOODWYN )  
\_\_\_\_\_ )

MOTION TO EXCLUDE TIME FROM MARCH 28, 2006, UNTIL  
RULE 11 PLEA HEARING TO BE HELD ON JUNE 29, 2006

The Defendant, James Goodwyn, through counsel, moves this court pursuant to 18 U.S.C. §3161(h) to exclude the time from the date of March 28, 2006, until the Rule 11 plea hearing to be held on June 29, 2006, from the calculation under the speedy trial act.

As reasons therefore, counsel asserts the following:

1. The motion is assented to by the Office of the United States Attorney as expressed in open court on March 28, 2006.
2. It is in the interest of justice to allow this motion.

By his Attorney,

/s/Joseph F. Krowski, Jr., Esquire  
JOSEPH F. KROWSKI, JR, ESQUIRE  
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Dated: March 29, 2006